

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHERYLL CLEWETT, STEVE BAUS,
and **AVATAR OJAR**, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

**NATIONAL POLICE & SHERIFFS
COALITION PAC, FRANK PULCIANI,**
and **CAMPAIGN CALLING, LLC**

Defendant.

Civil Case No.: 1:22-cv-06032

District Judge Andrea R. Wood

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANT CAMPAIGN CALLING LLC**

Plaintiffs Cheryll Clewett, Steve Baus, and Avatar Ojar (“Plaintiffs”) request an order for the entry of default against Defendant Campaign Calling LLC (“Campaign Calling”), pursuant to Rule 55 of the Federal Rules of Civil Procedure.

1. Plaintiffs Clewett and Baus filed the original Class Action Complaint on November 1, 2022, against NPSC as the sole Defendant, alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227 (the “TCPA”). Dkt. No. 1.

2. On March 23, 2023, the Court granted Plaintiffs’ motion for leave to file a First Amended Class Complaint asserting claims against NPSC as well as newly added defendants Frank Pulciani and Campaign Calling LLC on behalf of Plaintiffs.

3. On April 4, 2023, Plaintiffs filed an affidavit that summons was returned executed on Campaign Calling on April 3, 2023, upon a natural person having an agency relationship with the registered agent pursuant to Wyoming Statute § 17-28-104(a). Dkt. No. 30.

4. As of the date of this filing, January 26, 2024, Campaign Calling has failed to

answer or otherwise respond to the First Amended Class Action Complaint.

5. Under Rule 55(a) of the Federal Rules of Civil Procedure, “when a party against whom a judgment for affirmative relief is sought had failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”

6. Because Campaign Calling has failed to plead or otherwise defend, entry of default is warranted and appropriate.

Plaintiffs CHERYLL CLEWETT, STEVE BAUS, and
AVATAR OJAR, individually and on behalf of all others
similarly situated,

By: /s/ Jeffrey Blake

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Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

The undersigned certifies that on January 26, 2024, a true and correct copy of Plaintiffs' Motion For Entry Of Default Against Defendant Campaign Calling LLC, will be served on all counsel of record through the Court's CM/ECF system and will be sent via U.S. First Class Mail to the following:

National Police & Sheriffs Coalition PAC
c/o its authorized representative, Frank Pulciani
4600 Kingfish Lane, #601
Panama City Beach, FL 32408

Campaign Calling LLC
c/o its registered agent, Cloud Peak Law, LLC
1309 Coffeen Avenue, Suite 1200
Sheridan, Wyoming 82801

/s/ Jeffrey Blake